

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

JAMES L. WILLIAMS, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Civil Action 8:16-cv-00058-PWG
)	
CORELOGIC SAFERENT, LLC,)	
)	
Defendant.)	

**CONSENT MOTION TO AMEND INITIAL
SCHEDULING ORDER AND DISCOVERY ORDER**

Plaintiffs, James L. Williams and Hector Hernandez (“Plaintiffs”), and Defendant, CoreLogic SafeRent, LLC (“SafeRent”), through their counsel, respectfully request that this Court modify its March 15, 2016 Scheduling Order (Dkt. No. 10) and Discovery Order (Dkt. No. 10-1) as set forth below:

1. Since the initial Scheduling Order and Discovery Order were issued, Plaintiffs amended the Complaint to add Plaintiff Hernandez to the case and to also assert three putative nationwide class claims against SafeRent, along with certain other individual claims on behalf of both Plaintiffs. This modified schedule accommodates the need for additional discovery as it relates to the class claim and briefing on dispositive motions and on class certification prior to setting the deadlines for pretrial procedures and a trial. Additionally, this proposed Scheduling Order accounts for the new factual investigation that SafeRent desires to conduct on the new claims asserted, including with respect to the new factual allegations of Plaintiff Hernandez, before filing its responsive pleadings.

2. For those reasons, counsel for the parties have agreed upon the proposed deadlines as follows:

Deadline for SafeRent to file its responsive pleadings to the Complaint	May 4, 2016
Deadline for motions to join additional parties or to amend pleadings	June 1, 2016
Plaintiff's Rule 26(a)(2) expert disclosures	August 3, 2016
Defendant's Rule 26(a)(2) expert disclosures	September 7, 2016
Plaintiff's rebuttal Rule 26(a)(2) expert disclosures	September 28, 2016
Rule 26(e)(2) supplementation of disclosures and responses	October 12, 2016
Discovery deadline; submission of status report	October 19, 2016
Requests for Admission	October 26, 2016
Dispositive pretrial motions deadline	November 17, 2016
Motion for class certification deadline	November 17, 2016

3. Upon the submission of the request for a pre-motion conference with respect to a motion for class certification and/or motion for summary judgment, the parties request that the Court hold a status conference to establish a briefing schedule for the resolution of the motion(s).

4. The parties agree that discovery should include written discovery and depositions of the parties, third parties and disclosed experts, to the extent reasonably necessary to litigate class certification.

5. The parties agree that the provisions of Paragraph 5 of the Discovery Order, which presumptively limits the service of interrogatories under Fed. R. Civ. P. 33 to 15 interrogatories, should be increased to a limit of 30 interrogatories per side (inclusive of all

discrete subparts), absent a further showing of “good cause” or further stipulation consistent with the Local Rules for the United States District Court for the District of Maryland.

6. The parties agree that the provisions of Paragraph 6(a) of the Discovery Order, which presumptively limits the serve of requests for production under Fed. R. Civ. P. 34 to 15 requests, should be increased to a limit of 35 requests per side, absent a further showing of “good cause” or further stipulation consistent with the Local Rules for the United States District Court for the District of Maryland.

WHEREFORE, for the above-stated reasons, counsel for all parties respectfully request that the current Scheduling Order issued by the Court be modified as set forth above.

**JAMES L. WILLIAMS and
HECTOR HENANDEZ**

/s/ Kristi Cahoon Kelly

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th April, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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